

Mar 11, 2020

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

*Kathy A. Surratt - States*  
KATHY A. SURRATT-STATES  
Chief United States Bankruptcy Judge

In re:	)	Case No.: 20-41308-659
	)	Honorable Kathy A. Surratt-States
FORESIGHT ENERGY, LP, et al.	)	Chapter 11
	)	(Joint Administration Requested)
Debtors.	)	
	)	
	)	

**VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to LR 2090(B)(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, **Pedro Jimenez**, move to be admitted *pro hac vice* to the bar of this Court for the purpose of representing Javelin Global Commodities (UK) Ltd in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(F):

**a. Full name of the movant-attorney;**

Pedro Jimenez

**b. Address and telephone number of the movant-attorney;**

Paul Hastings LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6790  
Facsimile: (212) 757-3990  
Email: [pedrojimenez@paulhastings.com](mailto:pedrojimenez@paulhastings.com)

<sup>1</sup> The Debtors in these cases are each incorporated or organized in the state of Delaware, and along with the last four digits of each Debtor's federal tax identification number (or SEC filing number if unavailable), are: Foresight Energy LP (8894); Foresight Energy GP LLC (8332); Foresight Energy LLC (7685); Foresight Energy Employee Services Corporation (7023); Foresight Energy Services LLC (6204); Foresight Receivables LLC (2250); Sugar Camp Energy, LLC (8049); Macoupin Energy LLC (9005); Williamson Energy, LLC (9143); Foresight Coal Sales LLC (8620); Tanner Energy LLC (0409); Sitran LLC (9962); Seneca Rebuild LLC (0958); Oeneus LLC (6007); Adena Resources, LLC (4649); Hillsboro Transport LLC (6881); American Century Transport LLC (SEC No. 5786); Akin Energy LLC (1648); American Century Mineral LLC (SEC No. 5788); Foresight Energy Finance Corporation (5321); Foresight Energy Labor LLC (4176); Viking Mining LLC (4981); M-Class Mining, LLC (5272); MaRyan Mining LLC (7085); Mach Mining, LLC (4826); Logan Mining LLC (2361); LD Labor Company LLC (8454); Coal Field Repair Services LLC (9179); Coal Field Construction Company LLC (5694); Hillsboro Energy LLC (1639); and Patton Mining LLC (7251). The address of the Debtors' corporate headquarters is One Metropolitan Square, 211 North Broadway, Suite 2600, St. Louis, Missouri 63102.

- c. ***Name of the firm or letterhead under which the movant practices;***  
Paul Hastings LLP
- d. ***Name of the law school(s) movant attended and the date(s) of graduation therefrom;***  
University of Miami - 1998
- e. ***State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;***  
  
State of New York: 2006  
State of Florida: 1998  
United States District Court for the Southern District of Florida: 1998  
United States District Court for the Southern District of New York: 2006
- f. ***Statement that movant is a member in good standing of all bars of which movant is a member and that movant is not under suspension or disbarment from any bar;***  
  
Movant is a member in good standing of all bars of which Movant is a member and he is not under suspension or disbarment from any bar.
- g. ***Statement that movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.***

Movant does not reside in the Eastern District of Missouri, is not regularly employed in this District and is not regularly engaged in the practice of law in this District. Movant has associated with:

**Thomas H. Riske**  
Carmody MacDonald P.C.  
120 South Central Avenue, Suite 1800  
Clayton, MO 63105  
314-854-8600  
Fax: 314-854-8660  
Email: thr@carmodymacdonald.com

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: March 10, 2020

{20039/00000/2796833.DOC.}

CARMODY MACDONALD P.C.

By: /s/ Thomas H. Riske

CHRISTOPHER J. LAWHORN, #45713MO  
THOMAS H. RISKE, #61838MO  
120 S. Central Avenue, Suite 1800  
St. Louis, Missouri 63105  
(314) 854-8600  
(314) 854-8660 – FAX  
cjl@carmodymacdonald.com  
[thr@carmodymacdonald.com](mailto:thr@carmodymacdonald.com)

-and-

PAUL HASTINGS LLP

By: /s/ Pedro Jimenez

PEDRO JIMENEZ  
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New York, NY 10166  
Telephone: (212) 318-6093  
Facsimile: (212) 303-7093  
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Attorneys for Javelin Global Commodities (UK) Ltd

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 10, 2020, a true and correct copy of the above and foregoing pleading was filed with the Clerk of the Court using the CM/ECF system and the Notice of Electronic Filing indicates that all necessary parties were served with the document via the Court's CM/ECF.

/s/ Thomas H. Riske

**Certificate of Notice Pg 4 of 5**  
 United States Bankruptcy Court  
 Eastern District of Missouri

In re:  
 Foresight Energy LP  
 Debtor

Case No. 20-41308-kss  
 Chapter 11

**CERTIFICATE OF NOTICE**

District/off: 0865-4

User: admin  
 Form ID: pdfol

Page 1 of 2  
 Total Noticed: 2

Date Rcvd: Mar 11, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 13, 2020.

db +Foresight Energy LP, Metropolitan Square Building, 211 North Broadway, Suite 2600,  
 St. Louis, MO 63102-2742  
 aty +Pedro Jimenez, Paul Hastings LLP, 200 Park Avenue, New York, NY 10166-0019

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Mar 13, 2020

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 11, 2020 at the address(es) listed below:

Alice Belisle Eaton on behalf of Debtor Foresight Energy LP aeaton@paulweiss.com  
 Brad M. Kahn on behalf of Creditor Ad Hoc First Lien Group bkahn@akingump.com  
 Brian C. Walsh on behalf of Creditor Davidson Kempner Capital Management LP  
 brian.walsh@bclplaw.com  
 Christopher J. Lawhorn on behalf of Creditor Javelin Global Commodities (UK) Ltd  
 cjl@carmodymacdonald.com, txs@carmodymacdonald.com/aep@carmodymacdonald.com  
 Ira S Dizengoff on behalf of Creditor Ad Hoc First Lien Group idizengoff@akingump.com  
 Jaimie L Mansfield on behalf of Debtor Tanner Energy LLC jmansfield@atlpl.com,  
 bvogt@armstrongteasdale.com  
 Jaimie L Mansfield on behalf of Debtor Sugar Camp Energy, LLC jmansfield@atlpl.com,  
 bvogt@armstrongteasdale.com  
 Jaimie L Mansfield on behalf of Debtor Macoupin Energy LLC jmansfield@atlpl.com,  
 bvogt@armstrongteasdale.com  
 Jaimie L Mansfield on behalf of Debtor Williamson Energy, LLC jmansfield@atlpl.com,  
 bvogt@armstrongteasdale.com  
 Jaimie L Mansfield on behalf of Debtor Foresight Coal Sales LLC jmansfield@atlpl.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Oeneus LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Mach Mining, LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Foresight Energy Labor LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Foresight Energy Finance Corporation  
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Sitran, LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor MaRyan Mining LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Akin Energy LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Adena Resources, LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Seneca Rebuild LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor Hillsboro Transport LLC jwillard@armstrongteasdale.com,  
 bvogt@armstrongteasdale.com  
 John G. Willard on behalf of Debtor American Century Transport LLC  
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com

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Form ID: pdfol

Page 2 of 2  
Total Noticed: 2

Date Rcvd: Mar 11, 2020

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

John G. Willard on behalf of Debtor American Century Mineral LLC  
jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com  
Kathryn Redmond on behalf of Debtor LD Labor Company LLC kredmond@atllp.com, bvogt@atllp.com  
Kathryn Redmond on behalf of Debtor Coal Field Repair Services LLC kredmond@atllp.com,  
bvogt@atllp.com  
Kathryn Redmond on behalf of Debtor Coal Field Construction Company LLC kredmond@atllp.com,  
bvogt@atllp.com  
Kathryn Redmond on behalf of Debtor Logan Mining LLC kredmond@atllp.com, bvogt@atllp.com  
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lmckinnon@thompsoncoburn.com  
Marshall C. Turner on behalf of Creditor Huntington National Bank  
marshall.turner@huschblackwell.com,  
gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com  
Office of US Trustee USTPRegion13.SL.ECF@USD.OJ.gov  
Richard W. Engel, Jr. on behalf of Debtor Patton Mining LLC rengel@armstrongteasdale.com,  
bvogt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@armstrongteasdale.com  
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy GP LLC  
rengel@armstrongteasdale.com,  
bvogt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@armstrongteasdale.com  
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LLC rengel@armstrongteasdale.com,  
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Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LP rengel@armstrongteasdale.com,  
bvogt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@armstrongteasdale.com  
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bvogt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@armstrongteasdale.com  
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bvogt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@armstrongteasdale.com  
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Zachary Dain Lanier on behalf of Creditor Ad Hoc First Lien Group zlanier@akingump.com  
TOTAL: 42